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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

SANTIAGO ALONSO VAZQUEZ, SALVADOR
SANTIAGO BACILIO, TELESFORO TORRES, and JOSE
GONZALEZ,

Plaintiffs,

-against-

142 KNICKERBOCKER ENTERPRISE, CORP., d/b/a WOW
CAR WASH, GEORGE AUTO SPA, CORP., and MOSHE
AZOULAY

Defendants.

1:13-Civ-6085 (SLT)(VVP)

**~~PROPOSED~~ ORDER TO
SHOW CAUSE FOR A
TEMPORARY
RESTRAINING ORDER
AND PRELIMINARY
INJUNCTION**

Upon the Plaintiffs' Proposed Order to Show Cause for a Temporary Restraining Order and Preliminary Injunction, Plaintiffs' Memorandum of Law in Support of Plaintiffs' Motion for a Temporary Restraining Order and Preliminary Injunction, the Declaration of Amanda Bransford, dated March 2, 2015, the Declaration of Santiago Alonso Vasquez, dated March 1, 2015, all orders and pleadings filed in this action, and sufficient cause appearing therefore, it is hereby ordered that:

- a) Defendant Moshe Azoulay ("Defendant") show cause before this Court, at the United States District Court for the Eastern District of New York, at 225 Cadman Plaza East, at 11:00 a.m. on March 12 ~~o'clock~~, or as soon thereafter as counsel can be heard, why a preliminary injunction should not be issued pursuant to Fed. R. Civ.

P. 65:

- a. enjoining Defendant from in any way threatening, discriminating, or retaliating against Plaintiffs because they filed this action;
 - b. enjoining Defendant from contacting any law enforcement agent or agency or immigration law enforcement agent or agency or other government agent or agency to report information concerning the Plaintiffs, their acquaintances, or any potential witnesses in this matter; and
 - c. granting Plaintiffs such other and further relief as this Court deems appropriate, including the reimbursement of Plaintiffs' fees and costs associated with this motion.
- b) Sufficient reason has been shown that Plaintiffs have and will suffer immediate and irreparable injury, such that ^{and Plaintiffs have demonstrated a likelihood of success on the merits,} ~~from the occurrence of the presently scheduled~~ ^{SLT} ~~hearing~~ until the parties may be heard and this Court issues a decision on Plaintiffs' motion for preliminary injunctive relief, Defendant is temporarily enjoined from:
- a. in any way threatening, discriminating, or retaliating against Plaintiffs because they filed this action; or
 - b. contacting any law enforcement agent or agency or immigration law enforcement agent or agency or other government agent or agency to report information concerning the Plaintiffs, their acquaintances, or any potential witnesses in this matter.

Briefing on Plaintiff's motion for preliminary injunction is scheduled as follows: (i) Defendants shall serve and file with this Court their opposition to

